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# **RESULTS OF ENVIRONMENTAL FINDINGS FOR THE CABIN IN THE SKY**

## **Comstock Mining Inc. Soils Assessment Areas Affected by the Carson River Mercury Site Gold Hill, NV**

*Prepared for:*

*Comstock Mining Inc.  
1200 American Flat Road  
Gold Hill, Nevada*

| Soil and Groundwater Remediation

| Regulatory Compliance

| Environmental Audits

| Hydrogeology

| Hazmat Response

*August 13, 2012*

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# 1. INTRODUCTION AND EXECUTIVE SUMMARY

McGinley and Associates, Inc. (MGA) has prepared this Report of Findings for assessment activities conducted at the Comstock Mining Inc. (Comstock) site located in Gold Hill, Nevada. This Report addresses a specific area of the Comstock site (Site) that the Nevada Division of Environmental Protection (NDEP), Bureau of Corrective Actions (BCA) identified as a potential risk zone within the Carson River Mercury Superfund site (CRMS). The potential risk zone included for discussion within this report is the Cabin in the Sky property as shown on the attached Figures 2-4. The remainder of the Comstock site will be addressed in future reports.

MGA collected 16 samples from 4 locations per the NDEP-approved Sampling and Analysis Plan (SAP) and Addendum #9 to the SAP. Addendum #9 was submitted to the NDEP on June 14, 2012 and approved by the NDEP on June 15, 2012.

The investigations and analyses show that there were no exceedances of the NDEP's Screening/Action Levels for arsenic, lead or mercury. Per NDEP's May 4, 2012 guidance it is noted that all locations are elevated versus the NDEP-derived background values, however, none of the locations are CERCLA regulated.

## 1.1 Site Name

Comstock Mining Inc.

## 1.2 Site Location

The Site includes portions of the Comstock site potentially impacted by the CRMS in Storey and Lyon Counties in Nevada as shown on Figure 1. The Cabin in the Sky portion of the Site is shown on Figures 2-4.

## 1.3 Responsible Agency

This project is being conducted for the NDEP through the BCA Superfund Branch.

## 1.4 Project Organization

Title/Responsibility	Name	Phone
<b>Comstock</b>		
Director of Environmental and Regulatory Management	Cindi Byrns	(775) 847-5272
<b>NDEP</b>		
Program Coordinator for BCA Superfund Branch	Jeff Collins	(775) 687-9381
Case Officer – Review SAP, quality assurance	Jack Yates	(775) 687-9547
Case Officer – Review SAP, quality assurance	David Friedman	(775) 687-9385
<b>McGinley and Associates, Inc. (Contractor to Comstock)</b>		
Principal – Senior review, regulatory liaison	Joe McGinley	(775) 829-2245

Project Manager – Project management, regulatory liaison, coordinate field activities, data review, report preparation.	Brian A. Rakvica	(702) 260-4961
Quality Manager – Oversee implementation of SAP, review QA/QC procedures, data validation.	Brian Giroux	(775) 829-2245
Environmental Scientist – Conduct sampling activities	Doug Parcels	(775) 829-2245
CAD Operator – CAD support	Tim Dory	(775) 829-2245
Administrative Assistant – Administrative support	Linda Comstock	(775) 829-2245
<b>Contractors/Vendors</b>		
Columbia Analytical Services – drying, sieving and laboratory analysis of soil samples	Howard Holmes	(360) 501-3364
Castaway Trash Hauling – disposal of investigation-derived wastes	Jay Gardner	(775) 342-2444
Neptune and Company, Inc. – validation of data.	David Gratson	(505) 662-0707
Cascade Drilling – drilling services	Paul Snelgrove	(916) 638-5611

## 1.5 Statement of the Specific Problem

The Cabin in the Sky is a former restaurant that has been purchased by Comstock for use as offices and a visitors' center. The Cabin in the Sky property is near mining and exploration portions of the project currently. Comstock currently has no plans to conduct mining or exploration activities on the property.

Based upon BCA's April 2011 Potential Risk Zone Map, The western portion of the property was potentially impacted by the CRMS. Comstock assessed the Cabin in the Sky property to evaluate the presence or absence of contaminants of concern (COCs) within the NDEP-designated potential risk zones. It is noted that the names of the historic workings identified in NDEP's *Draft Carson River Mercury Superfund Site Long-Term Sampling and Response Plan (LTSRP)* dated December 16, 2011 (NDEP, 2011) are not always consistent with the names used by the local residents. The Final Report uses the names identified in the LTSRP as well as the local names for clarity. The analytical data was compared to the current screening/action levels for the CRMS as listed in the LTSRP as subsequently modified by NDEP's May 4, 2012 letter. Based on the results of these comparisons, the Cabin in the Sky property is not CERCLA-regulated and no further action is needed at this time. The data and the proposed path forward for the Cabin in the Sky property are discussed herein.

## 2. SCOPE OF SERVICES

The environmental assessment activities discussed herein were conducted in accordance with the "Sampling and Analysis Plan, Comstock Mining Inc., Soils Assessment, Areas Affected by the Carson River Mercury Site, (January 25, 2012)" as approved by the NDEP and Addendum #9, also approved by the NDEP. The scope of our activities included:

- Collecting 16 soil 5-point composite samples;
- Implementation of the Site approved Health and Safety Plan for all sampling activities;

- Obtaining Global Positioning System (GPS) coordinates for each soil sampling location;
- Photographing all soil sample locations;
- Submitting soil samples to an NDEP-approved laboratory under approved sample handling protocols;
- Analytical testing of collected soil samples for lead (Pb), mercury (Hg) and arsenic (As);
- Conducting data review and data validation of all analytical results;
- Disposing of investigation derived wastes (IDW); and,
- Preparation of this Report of Findings.

### 3. BACKGROUND

Mining in the Carson River drainage basin commenced in 1850 when placer gold deposits were discovered near Dayton at the mouth of Gold Canyon. Throughout the 1850s, mining consisted of working placer deposits for gold in Gold Canyon and Sixmile Canyon. These placer deposits ultimately led to the discovery of the underground ore deposits known as the Comstock Lode.

The initial ore discovered was extremely rich in gold and silver. Gold was more abundant in Gold Canyon while silver was more abundant in Sixmile Canyon (NDEP, 2011). Early mining methods concentrated on exposing as much of the lode as possible in wide trenches. Throughout 1859, ore was shipped to San Francisco for processing. After local ore processing began in 1860, most major mines operated their own mills, but there were also a large number of private mills. Initial ore processing techniques were slow and inefficient and a fair amount of trial and error experimentation led to the development of an effective ore-processing technique known as the Washoe pan process. Refinements were aimed primarily at increasing the speed of gold and silver recovery, increasing the percentage of gold and silver recovered and decreasing the amount of gold and silver discarded in tailings piles. The general milling process employed before 1900 involved pulverizing ore with stamp mills, creating a slurry, and then directing the slurry across a copper plate coated with mercury. The precious metals would adhere to the mercury on the copper plate in an amalgamation of recoverable metals. The millwrights would scrape the mercury amalgam from the copper plates and recover the precious metals through use of a smelting furnace. The majority of the mercury was recovered and reused in the process, however, some mercury was consumed in the process because of inefficiencies and losses in the amalgamation process, as well as in the smelting and retort process. After 1906, cyanide leaching and flotation processes replaced amalgamation and mercury use was generally discontinued.

Gold and silver production from the Comstock Lode increased slowly during the early years and 1863 was the first year of large production. Throughout the remainder of the 1860s and most of the 1870s, production remained high as rich ore bodies continued to be discovered at progressively deeper depths. The bottom of the lode was abruptly reached in 1877 at a depth of about 1,650 feet, and 1878 was the first year of dramatically reduced production. Between 1877 and 1878, ore production dropped from 562,519 tons to 272,909 tons and the total value decreased from \$36,301,536 to \$19,661,394. In 1879, production and value dropped even further. In 1901, the first cyanide-leaching operation began in Sixmile Canyon. Cyanide leaching was capable of recovering more gold and silver from lower-grade material than was possible by amalgamation methods and during the early 1900s mining operations consisted of mining lower-grade material and reworking former ore dumps and tailings piles. Between approximately 1920 and 1950, large tonnages of low-grade ores were mined (NDEP, 2011).

### 3.1 Sampling Area Description

The Cabin in the Sky property is approximately 0.94 acres as shown on Figures 2-4. As there is no historic evidence of mining related activities occurring on this property, it most closely resembles the “residential properties” scenario as identified in the NDEP-approved SAP Section 4.1.4. Soil sampling activities within the Cabin in the Sky property specifically targeted the upper two feet of soil and sample locations were based upon professional judgment and field constraints.

### 3.2 Previous Investigations/Regulatory Involvement

In the 1970's the United States Geological Survey (USGS) discovered high mercury levels in water samples in the Carson River. Subsequently, the USEPA designated the CRMS and placed it on the National Priority List (NPL) regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The USEPA divided the CRMS into two Operable Units (OU's): OU1 consists of the mill sites and those areas where tailings have contaminated surface soil (generally the source areas), and OU2 is the Carson River itself, including sediments and biota (generally the depositional/ecological areas). USEPA designated NDEP as the CRMS lead agency to manage OU1 of the CRMS and NDEP delegated this responsibility to the BCA. Areas likely to have the highest levels of COCs include former mill sites and associated drainage pathways down-gradient of mill sites as well as within the Carson River system itself.

### 3.3 Geological Information

The geology of the Site has been mapped as Quaternary Young Alluvium with Tertiary intrusions consisting of Alta Formation, Biotite Horneblende Andesite Dikes, Santiago Canyon Tuff, and Davidson Diorite (Hudson, 2009). The Young Alluvium is described as poorly sorted Holocene deposits of boulder to silt-sized material deposited on alluvial fans and as channel deposits. The Alta Formation, Biotite Horneblende Andesite Dikes, and Davidson Diorite are described as magmatic suites consisting of horneblende andesite dikes and intrusions. Lastly, the Santiago Canyon Tuff is described as Miocene-Oligocene tuff and sediment consisting of light gray to pinkish gray, moderately to strongly welded, rhyolitic tuff and can be as much as 120 m thick (Hudson, 2009). Additional details regarding the site geology are discussed in detail in the SRK geochemical evaluation contained in Appendix A (SRK, 2012).

Based on State of Nevada Division of Water Resources well log data for the vicinity of the Site, groundwater is estimated to be between 12 and 100 feet below ground surface (bgs).

### 3.4 Environmental and/or Human Impact

Historic mining activities in the Comstock region used elemental mercury to amalgamate gold and silver. It has been estimated that 7,500 tons (15,000,000 pounds) of elemental mercury was lost in the process of obtaining gold and silver. Additionally, lead and arsenic were concentrated and discharged during the ore extraction and processing. These compounds (mercury, lead and arsenic) migrated into soils via fluvial pathways and hence into the Carson River system along a 75-mile stretch of the Carson River from New Empire, just east of Carson City, to its termination points at Carson Lake, Stillwater Wildlife Refuge and the Carson Sink. Episodic flooding and fluvial deposition have produced areas with high COC levels which represent “hot spots” within a wider area of possible contamination.

During site investigation activities, USEPA was not able to collect enough data to define a precise site boundary for the CRMS. NDEP and USEPA have instead developed a preliminary method of bounding the Site. As a preliminary method of bounding the Site, NDEP identified potential risk area boundaries, meaning the largest areas within the general CRMS site description where there is a potential that historic mill sites or tailings might be present and where soil might contain mercury in concentrations above 80 mg/kg. Conversely, USEPA and NDEP have excluded from the CRMS upland areas and areas away from historic mill sites. NDEP developed a CRMS potential risk area boundary map (“NDEP Risk Area Map”) that was first made available to the public on the NDEP website on April 27, 2011.

## 4. PROJECT DATA QUALITY OBJECTIVES

Project Data Quality Objectives (DQOs) are addressed in the NDEP-approved SAP and as such are not repeated herein.

### 4.1 Data Quality Indicators (DQIs)

Data quality indicators (precision, accuracy, representativeness, completeness, comparability and sensitivity (i.e., PARCCS parameters) refer to quality control criteria established for various aspects of data gathering, sampling, and/or analyses. DQIs are discussed in detail in the NDEP-approved SAP and that discussion is not repeated herein.

### 4.2 Data Review and Validation

Data review and validation was completed per the NDEP-approved SAP. Detailed data validation summary reports are provided as Appendix A to this Report. Due to the size of these reports they are only provided electronically. Data was minimally qualified and no data were found to be unusable.

In addition, MGA’s QA officer supervised and performed data quality assessment tasks. MGA comprehensively evaluated and documented measurement data to monitor consistency with measurement quality objectives (MQOs), to quantitatively assess data quality, and to identify potential limitations to data use. MGA reviewed field and analytical laboratory data generated for this project, including the following:

- Chain of custody documentation;
- Laboratory batch QC frequency; and,
- Results of batch and field QC analyses.

These items were reviewed on a daily basis as samples were collected and delivered to the laboratory. In addition, MGA maintained continuous communication with Neptune and Company (Neptune) as 3<sup>rd</sup> party data validation was occurring and as the Site-wide database was being populated.

### 4.3 Data Management

Sampling was conducted in accordance with MGA’s standard operating procedures (SOPs). A unique identification number was assigned to each sample. The number is an alphanumeric

sequence that serves as an acronym to identify the sample. The following format was used for the sample designation:

Soil Samples:

**Sample ID:** COM001-SS-01-1.0

**COM001** - MGA Project Number

**SS-01** – Soil Sample Number (i.e., #1)

**1.0** – Depth of Soil Sample (feet below ground surface)

Field logs were maintained throughout the project. Soil samples were preserved or cooled as required for each laboratory analysis. Samples were delivered or shipped to the laboratory under approved chain-of-custody protocol.

#### **4.4 Assessment Oversight**

Any modifications to the sampling plan were documented in the field logs and in this Final Report as “deviations from the sampling plan.” Several minor modifications to proposed sampling locations were completed to allow for logistical and safety constraints in the field. The sampling locations, as presented on Figures 2-4, represent the as-sampled locations.

### **5. SAMPLING RATIONALE**

The sampling rationale was discussed in detail in the NDEP-approved SAP and is summarized below. The Cabin in the Sky property included 5-point composite samples. The specific locations of each of the points of the composite were laid out in the field based upon field conditions. For example, if visual evidence of tailings or historic disturbance was noted within the area of a five-point composite, the sampling points of the composite were biased towards areas of visual evidence. Every point of the 5-point composite was located with GIS-grade equipment and this information is provided as part of the Microsoft Access database and the site geodatabase provided within the electronic version of the report.

This property is most similar to a residential property as described in the SAP. The site was shown as being within NDEP’s Risk Area map, however, no evidence of historic impacts were present at the property. The data is presented on Figures 2-4. 16 samples were collected as part of this sampling effort.

#### **5.1 Soil Sampling**

The depth of soil sampling is discussed above. All soil samples were lab sieved to 250 microns (60 mesh). All soil samples from 0-2’ bgs were collected using hand tools, a powered auger or a direct push drill rig.

### **6. REQUEST FOR ANALYSIS**

Laboratory analyses are discussed in Section 6.1 below.

## 6.1 Soil Samples

The soil samples were collected as described above and analyzed for the following (per the NDEP's LTSRP guidance):

- Mercury – USEPA Method 7471A or B sieved to 250 microns (60 mesh)
- Arsenic and Lead – USEPA Method 6010B or C, digestion 3050, sieved to 250 microns (60 mesh)

## 6.2 Analytical Laboratory

All analytical testing was conducted by Columbia Analytical Services (CAS). Analytical testing and sample handling was conducted in accordance with CAS's SOPs (as detailed in the NDEP-approved SAP).

## 7. FIELD METHODS AND PROCEDURES

Field methods and procedures were per the NDEP-approved SAP. No deviations were noted.

## 8. SAMPLE CONTAINERS, PRESERVATION AND STORAGE

Sample containers, preservation and storage were per the NDEP-approved SAP. No deviations were noted.

## 9. DISPOSAL OF RESIDUAL MATERIALS

Waste generated during this investigation includes decontamination fluids, used personal protective equipment (PPE) and disposable sampling equipment.

Decontamination fluids consisted of deionized or distilled water, residual contaminants, and water with non-phosphate detergent. The water and water with detergent were poured into drums. Drums were labeled as waste with "characterization pending" until the analytical data were received. While waiting for the analytical data, the drums were stored on-site in a secure location. Based upon the analytical data, the drums were disposed of at an appropriate regulated facility.

Waste soil was drummed and disposed of after analytical data were received from the laboratory. Drums were labeled as waste with "characterization pending" until the analytical data were received. While waiting for the analytical data, the drums were stored on-site in a secure location. Based upon the analytical data, the drums were disposed of at an appropriate regulated facility.

Disposable sampling equipment and used PPE were double bagged and disposed of in a municipal refuse dumpster.

## 10. SAMPLE DOCUMENTATION AND SHIPMENT

### 10.1 Field Notes

#### 10.1.1 Field Logbooks

Field logs were completed describing all field activities, as discussed in the NDEP-approved SAP.

### **10.1.2 Photographs**

Photographs were taken as discussed in the NDEP-approved SAP. Photos of sampling in the Cabin in the Sky Property are provided as Appendix B.

## **10.2 Labeling**

All samples collected were labeled in a clear and precise manner for proper identification in the field and for tracking in the laboratory. The samples had pre-assigned, identifiable, and unique numbers as discussed above.

## **10.3 Sample Chain-of-Custody Forms and Custody Seals**

All samples were delivered to the laboratory under chain-of-custody protocol. Laboratory supplied custody seals were used to seal the screw lid of each sample container.

## **10.4 Packaging and Shipment**

Samples were placed in a sturdy cooler. Bubble wrap was placed in the bottom of the cooler. Sample containers were placed in containers provided by the laboratory. Ice was packed in zipper-locked, double plastic bags. Empty space in the cooler was filled with bubble wrap.

# **11. QUALITY CONTROL**

## **11.1 Assessment of Field Variability (Field Duplicates or Co-located Samples)**

Duplicate soil samples were collected for laboratory quality control purposes for each discrete area sampled or for one in every 20 samples. It is noted that the NDEP may request to take splits or duplicate samples; however, no USEPA or NDEP split or duplicate samples were requested and none were collected in the Cabin in the Sky property.

## **11.2 Laboratory Quality Control Samples**

Laboratory QC (e.g., matrix spike/matrix spike duplicate samples) samples were analyzed to monitor the precision and accuracy of its analytical procedures. These samples are discussed in detail in the data validation summary reports contained in Appendix A.

# **12. DATA EVALUATION**

## **12.1 Mercury**

Mercury data is presented on Table 1 and Figure 4. There were no exceedances of the NDEP's Residential Screening/Action Level. The range of concentrations is from 0.282 to 3.92 mg/Kg. The mean concentration is 1.26 mg/Kg. These data show that the mercury concentrations within the Cabin in the Sky property are well below the NDEP's Residential Screening/Action Level of 80 mg/Kg.

NDEP derived site-specific background values and provided a range of 0 - 1.5 mg/Kg for mercury. There are several locations at the site which exceed 1.5 mg/Kg, however, all locations

are below NDEP's Screening/Action Levels and/or site-specific background values as derived by the NDEP. These are all classified as Category 3 materials as defined in the NDEP's May 4, 2012 letter and hence are not regulated under CERCLA.

## **12.2 Lead**

Lead data is presented on Table 1 and Figure 3. There were no exceedances of the NDEP's Residential Screening/Action Level. The range of concentrations is from 62.2 to 264 mg/Kg. The mean concentration is 103.62 mg/Kg. These data show that the lead concentrations within the Cabin in the Sky property are well below the NDEP's Residential Screening/Action Level of 400 mg/Kg.

NDEP derived site-specific background values and provided a range of 0 - 63 mg/Kg for lead. There are several locations at the site which exceed 63 mg/Kg, however, all locations are below NDEP's Screening/Action Levels and/or site-specific background values as derived by the NDEP. These are all classified as Category 3 materials as defined in the NDEP's May 4, 2012 letter and hence are not regulated under CERCLA.

## **12.3 Arsenic**

Arsenic data is presented on Table 1 and Figure 2. There were no exceedances of the NDEP's Residential Screening/Action Level. The range of concentrations is from 4.9 to 30.5 mg/Kg. The mean concentration is 11.56 mg/Kg. These data show that the arsenic concentrations within the Cabin in the Sky property are below the NDEP's Residential Screening/Action Level of 32 mg/Kg.

NDEP derived site-specific background values and provided a range of 0 - 90 mg/Kg for arsenic. There are no locations at the site which exceed 90 mg/Kg.

# **13. PROPOSED MITIGATIVE MEASURES**

As noted above, Comstock does not believe that any mitigative measures are necessary as the concentrations of COCs present throughout the Cabin in the Sky are within acceptable health-based levels.

# **14. TRENDS**

In the May 4, 2012 letter, BCA has requested that Comstock include a discussion of data trends and discoveries over the entire sampling area including: evidence for or against historic aerial deposition of COCs; whether site COCs were spatially found to be regular, predictable and continuous or unpredictable, irregular and isolated, and what COC trends were encountered with depth.

Comstock has previously submitted a final report for the Lucerne Pit Area, which has been approved by NDEP. The Lucerne Pit Area samples identified naturally occurring minerals and were consistently less than COC action levels for mercury and lead and variable above and below action levels for arsenic. The location and variation in concentrations is consistent with a structure driven ore body. The Hartford Mill samples while elevated, were not above COC action levels. The nature of the Cabin in the Sky property is substantially different than

the Lucerne Pit Area in terms of historic usage and it does not appear appropriate to compare the two, however, Comstock notes that all data collected allows for a fuller understanding of the site.

Comstock notes that the data presented herein continue to confirm the USEPA's analysis that CRMS-related materials would be found in proximity to Comstock era mills and tailings piles and fluvial deposits from such sites, but that it would not be found in upland areas or areas even a short distance from Comstock era mills and tailings piles and associated fluvial deposits. Consistent with that trend, it was not expected that the Cabin in the Sky property would have been impacted by CRMS-related materials and the data confirm that conclusion. The Cabin in the Sky property data also show that the mineralization in the area appears to be heterogeneous and dependent upon the presence of ore bodies and ore materials.

## **15. CONCLUSIONS AND PATH FORWARD**

All samples at the Cabin in the Sky property are within NDEP Categories 1-3. No further action is required or proposed for removal from the CRMS.

## **16. REFERENCES**

Hudson, 2009. Hudson, Donald M., Stephen B. Castor, Larry J. Garside, and Christopher D. Henry, 2009. *Map 165 – Geologic Map of the Virginia City Quadrangle, Washoe, Storey, and Lyon Counties and Carson City, Nevada*. Nevada Bureau of Mines and Geology.

MGA, 2012. *Sampling and Analysis Plan, Comstock Mining Inc., Soils Assessment, Areas Affected by the Carson River Mercury Site, Gold Hill, NV*, January 25.

NDEP, 2011. *Draft Carson River Mercury Superfund Site Long-Term Sampling and Response Plan Risk Assessment and Soil Management*. November 10.

# TABLE

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**Table 1 - Cabin in the Sky Sampling Results**

Sample	Beginning Depth	Ending Depth	Result (mg/kg)	Result (mg/kg)	Result (mg/kg)	Material Category (per NDEP 5/4/12 letter)
			Mercury	Lead	Arsenic	
COM001-SS-CS01	0	6	0.857	114	9.7	3
COM001-SS-CS01	6	12	0.922	130	11.4	3
COM001-SS-CS01	12	18	0.595	91.5	9	3
COM001-SS-CS01	18	24	0.644	82.5	6.7	3
COM001-SS-CS02	0	6	0.568	77.3	4.9	3
COM001-SS-CS02	6	12	0.759	78.8	4.9	3
COM001-SS-CS02	12	18	0.987	90.1	5.1	3
COM001-SS-CS02	18	24	1.25	97.4	5.5	3
COM001-SS-CS03	0	6	3.92	64.8	8.2	3
COM001-SS-CS03	6	12	2.75	95.4	7.6	3
COM001-SS-CS03	12	18	2.6	70.9	6.7	3
COM001-SS-CS03	18	24	2.01	62.2	7.8	3
COM001-SS-CS04	0	6	0.282	74.2	19	3
COM001-SS-CS04	6	12	0.357	93.8	28.7	3
COM001-SS-CS04	12	18	0.549	264	30.5	3
COM001-SS-CS04	18	24	1.06	171	19.3	3

Minimum = 0.282 62.2 4.9

Maximum = 3.92 264 30.5

Mean = 1.26 103.62 11.56

Standard Deviation = 1.00 49.06 8.04

Notes:

1. NDEP Screening/Action Levels

Arsenic - 32 mg/Kg

Lead - 400 mg/Kg

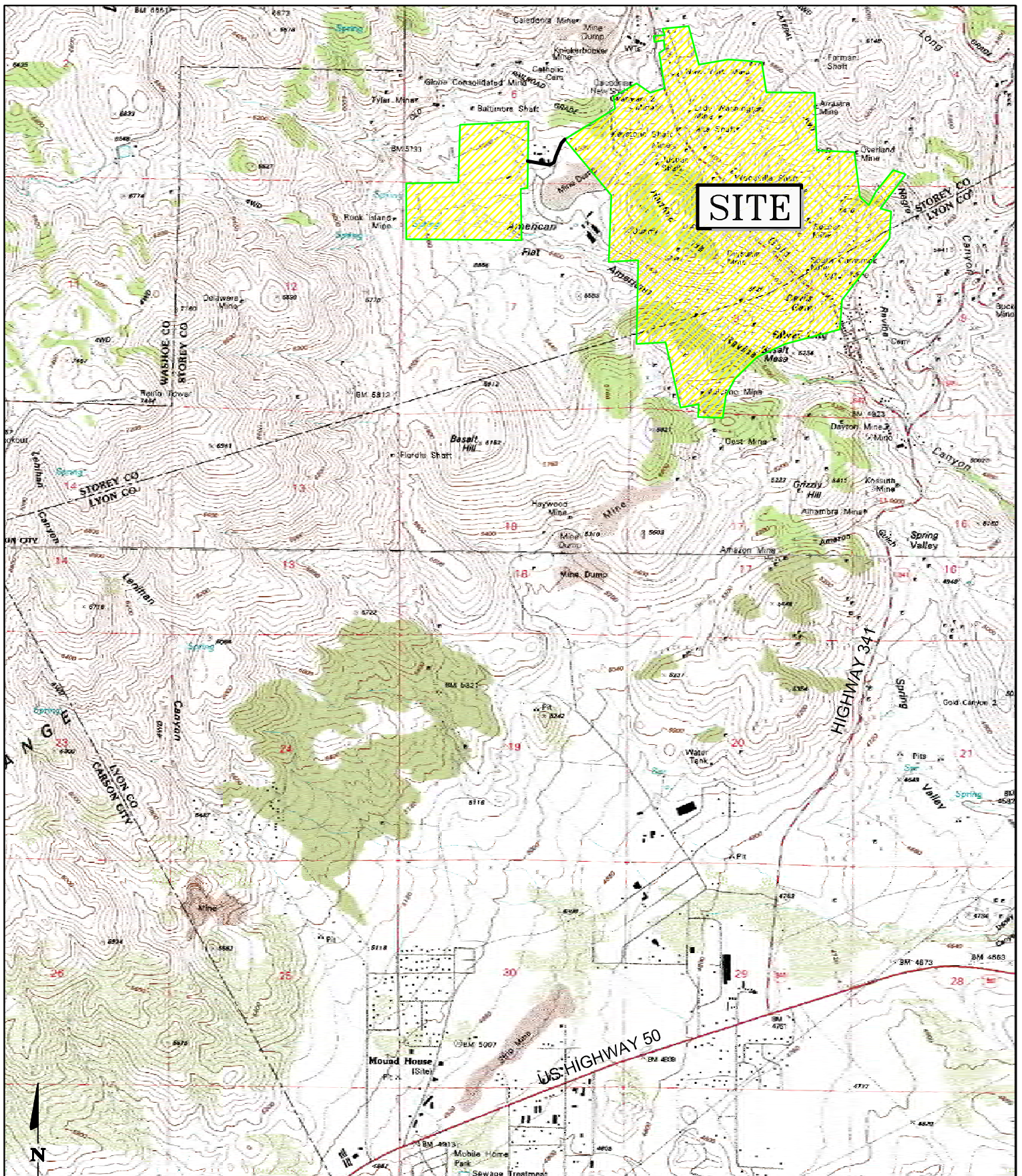
Mercury - 80 mg/Kg

2. Shading indicates a data point greater than NDEP Screening/Action Level

3. Per NDEP's 5/4/12 Letter categories 1-3 are not CERCLA-regulated materials.

# FIGURES


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REVISIONS	DESIGNED	BH
	DRAWN	TAD
	CHECKED	
	APPROVED	
	No.	DESCRIPTION BY DATE
1		
2		
3		
4		
5		

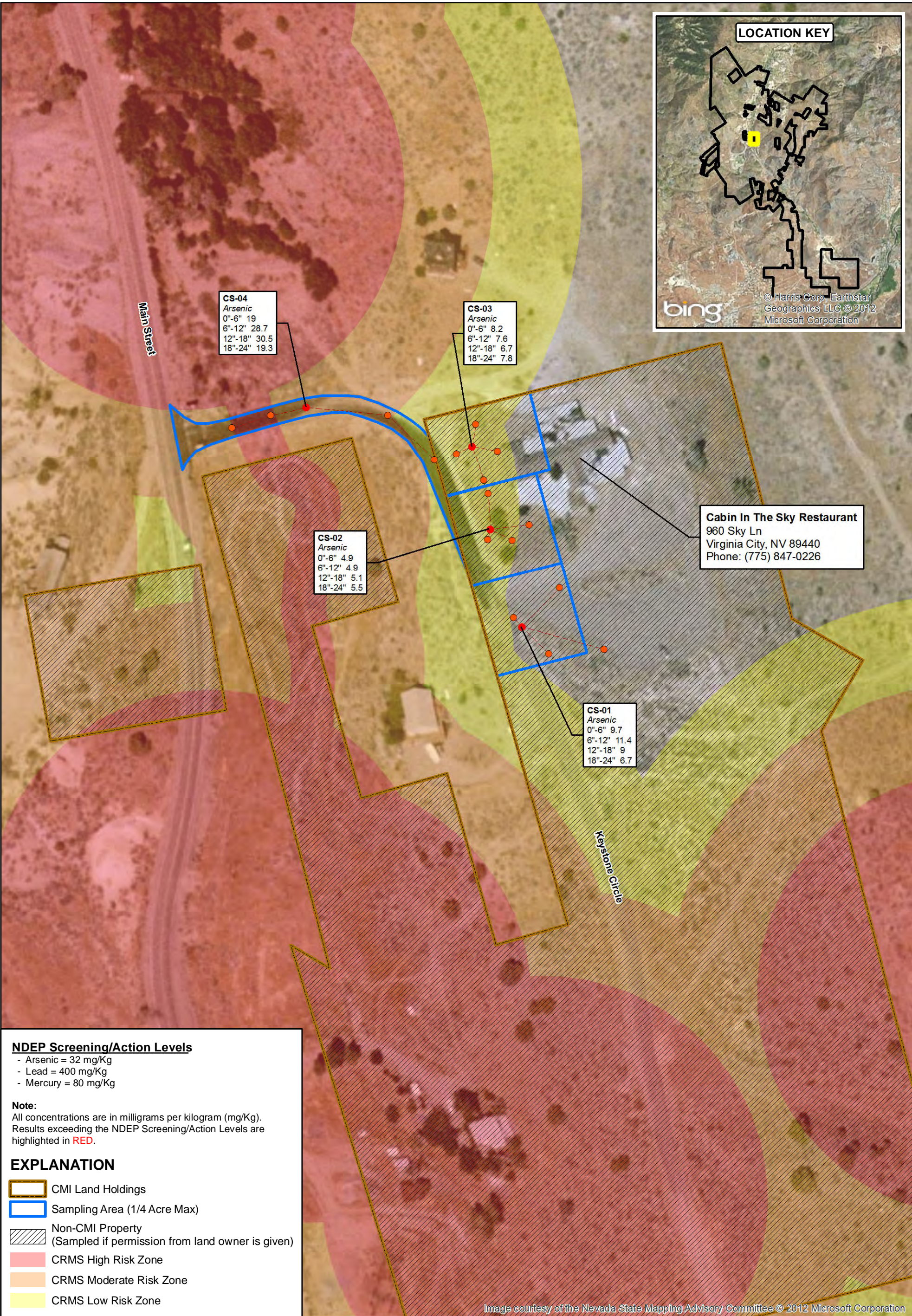
**FIGURE 1**

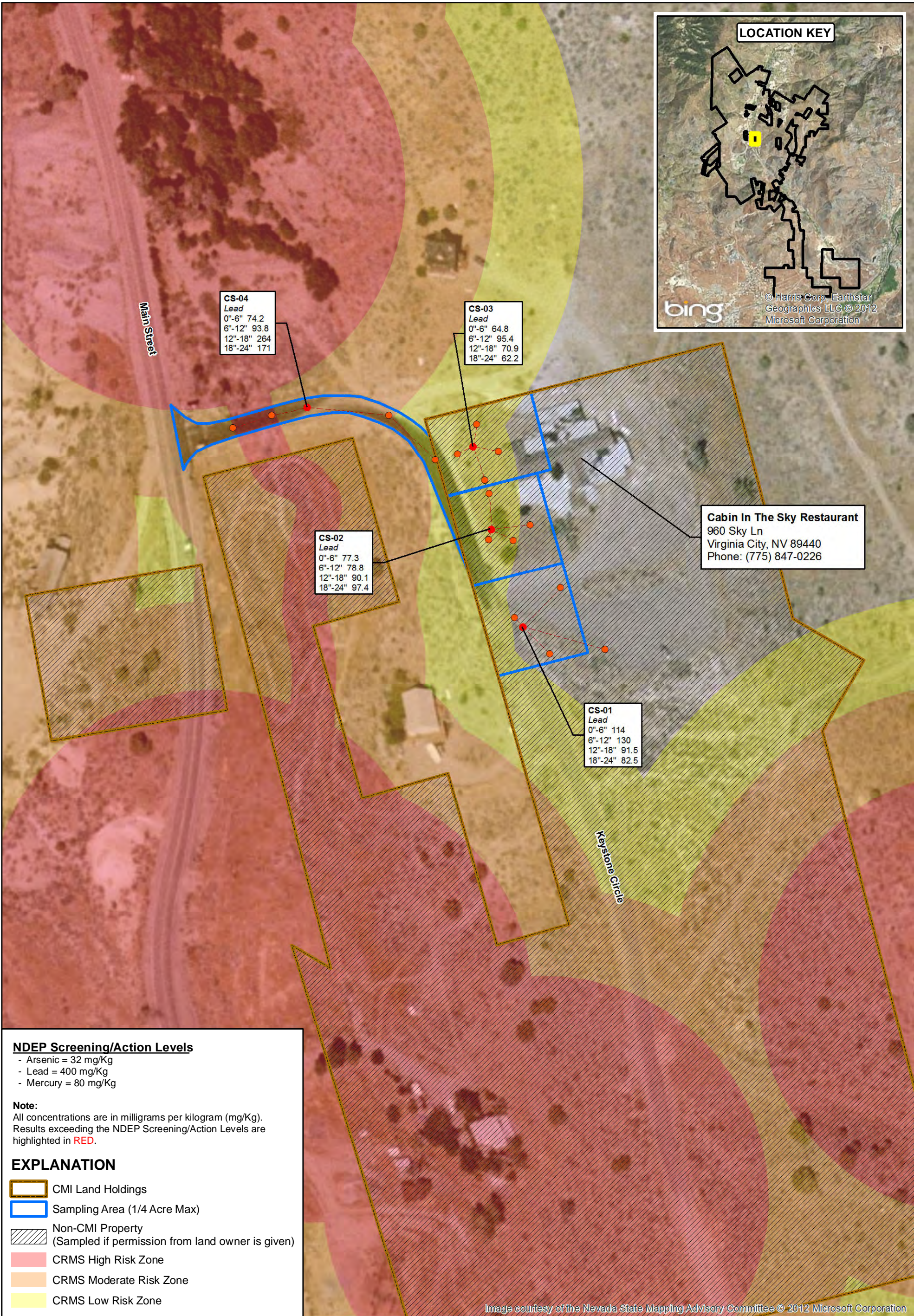
**PROJECT LOCATION MAP**  
-SHOWING-  
**COMSTOCK MINE**  
**STOREY COUNTY, NEVADA**

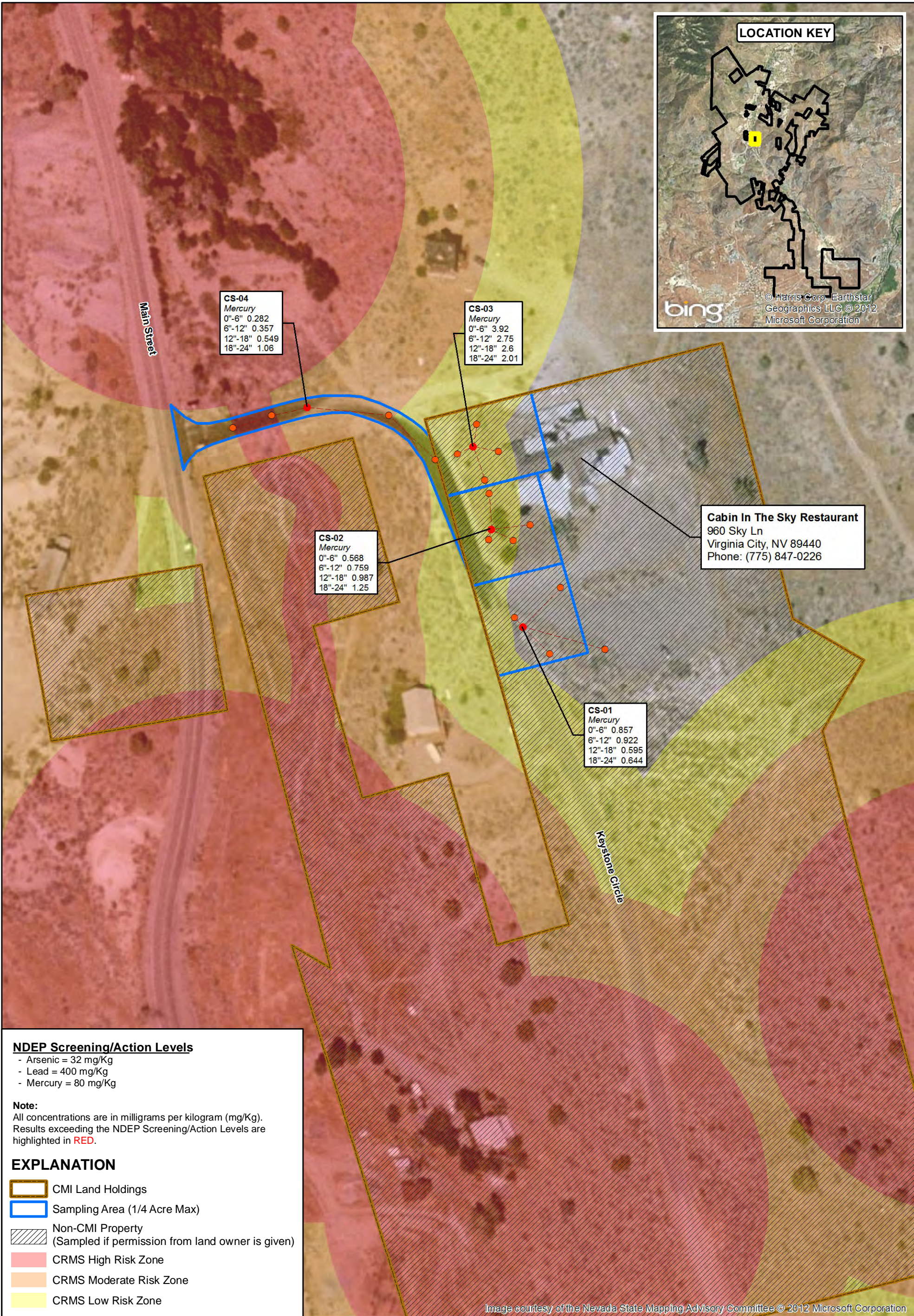


McGinley & Associates

SCALE: AS SHOWN	REVISION
JOB NO. COM-001	<b>A</b>







# **APPENDIX A**

**Data Validation Summary Reports (provided with electronic version of the report only)**

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# APPENDIX B

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## Photograph Log



CS-01



CS-02

McGinley & Associates, Inc.  
Comstock Mining Inc.  
CRMS Sampling and Analysis Plan

Photographic Log  
Survey Points  
7/13/12  
ASW Project Number: 039-007  
PLATE 1



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CS-03



CS-04